## MEMO ENDORSED

## Law Offices of Daniel A. Hochheiser

ATTORNEY AT LAW
2 Overhill Road, Suite 400
Scarsdale, New York 10583
dah@hochheiser.com
(646) 863-4246

May 10, 2023

Via ECF and Email Hon. Paul E. Davison United States Courthouse 300 Quarropas St. White Plains, NY 10601-4150

Re: USA v. Rafael Grullon, 22 MJ 6662

Request to Modify Bail Conditions to Permit Travel to Pennsylvania

Your Honor:

Grullon wishes to take a trip with his family from his home in New York City to Great Wolf Lodge, 1 Great Wolf Drive, Scotrun, PA 18355. The dates of the trip would be May 14, 2023 through May 16, 2023.

On August 12, 2022, Grullon was released on an appearance bond subject to an Order Setting Conditions of Release (ECF 4) which includes ¶7(f) restricting Grullon's travel to SDNY and EDNY. Grullon seeks permission to modify ¶7(f) to include travel to and from Great Wolf Lodge located in the Middle District of Pennsylvania (MDPA), including permission to travel through the District of New Jersey enroute between Grullon's home in New York City and Great Wolf Lodge.

I have conferred with Pre-Trial Services and the Government. There is no objection to this request.

Respectfully submitted,

Daniel A. Hochheiser

Cc: AUSA Kevin Sullivan

U.S. Pre-Trial Services Officer Vanessa Perdomo

APPLICATION GRANTED

Hon, Paul E. Davison, U.S.M.J.

5/10/23